

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN SECTION OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE , CORTEZ D. BROWN, DEONTAE TATE, JEREMY S. MELTON, ISSACCA POWELL, KEITH BURGESS, TRAVIS BOYD, and TERRENCE DRAIN on behalf of themselves and all similarly situated persons,

PLAINTIFFS,

V.

BILL OLDHAM, in his individual capacity and in his official capacity as the Sheriff of Shelby County, Tennessee; **ROBERT MOORE**, in his individual capacity and in his official capacity as the Jail Director of the Shelby County, Tennessee; **CHARLENE McGHEE**, in her individual capacity and in her official capacity as the of Assistant Chief Jail Security of Shelby County, Tennessee; **DEBRA HAMMONS**, in her individual capacity and in her official capacity as the Assistant Chief of Jail Programs of Shelby County, Tennessee; **SHELBY COUNTY, TENNESSEE**, a Tennessee municipality; and **TYLER TECHNOLOGIES, INC.**, a foreign corporation,

DEFENDANTS.

Case No. 2:16-cv-2907-SHM/tmp

**CLASS ACTION COMPLAINT FOR
VIOLATIONS OF THE CIVIL RIGHTS
ACT OF 1871, 42 U.S.C. § 1983, AND
TENNESSEE COMMON LAW**

**JURY TRIAL DEMANDED
PURSUANT TO FED. R. CIV. PRO. 38(a)
& (b)**

**NOTICE OF SERVICE OF PLAINTIFFS' SECOND SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED UPON
DEFENDANT TYLER TECHNOLOGIES, INC.**

COME NOW Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell, Keith Burgess, Travis Boyd, and Terrence Drain, on behalf of themselves and all other similarly situated persons, by and through their designated attorneys and, pursuant to Local Rule 26.1(a)(2), provide this Notice that on December 14, 2018, Plaintiffs served their Second Set of Interrogatories and Requests for Production of Documents Propounded upon Defendant Tyler Technologies, Inc.

Respectfully submitted,

/s/ William E. Cochran, Jr.

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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on December 14, 2018, the foregoing was served the Court's ECF filing system on:

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